

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
Scott and Aimee Cantwell	:	
DEBTOR	:	BKY. NO. 17-13751JKF13
Scott and Aimee Cantwell	:	
Plaintiff	:	
vs.	:	ADV. NO.
PNC Bank National Association	:	
Defendant	:	

COMPLAINT TO DETERMINE SECURED STATUS

1. Debtors owe their residence with a value of \$310,000. The appraisal report is attached. **Exhibit A.**
2. The Debtors have a first position mortgage with Seterus with a balance of approximately \$440,00.
3. The junior mortgage to PNC of approximately \$225,000 is wholly unsecured.

WHEREFORE, Debtors/Plaintiffs pray that pursuant to 11 USC 506 and in Re: McDonald that this is honorable that this honorable court enter an order finding the mortgage debt to PNC to be wholly unsecured.

Respectfully submitted,

Date: **July 20, 2017**

BY: /s/ Michael A. Cataldo
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